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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Carlos Garcia,

Plaintiff,

vs.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,

Defendant.

Case No. 1:20-cv-00924-BAK (SKO)

STIPULATION AND PROPOSED  
ORDER FOR EXTENSION OF  
TIME

(Doc. 23)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from January 14, 2022 to February 14, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S REPLY BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for this request. Counsel for the Plaintiff is currently in Houston, Texas due to a family emergency involving Counsel's father who is gravely ill with

1 Leukemia. (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is  
2 a principal caregiver. Additionally, Counsel has limited access to her computer and  
3 will require additional time to brief this matter upon her return to California.

4 Counsel for Plaintiff attempted to obtain Defendant's position on this motion  
5 but did not receive a response. Counsel apologizes to the Defendant and Court for  
6 any inconvenience this may cause.

7  
8 Respectfully submitted,

9 Dated: January 6, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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11 By: /s/ Dolly M. Trompeter  
12 DOLLY M. TROMPETER  
13 Attorneys for Plaintiff

14  
15 Dated: January 6, 2022

16 PHILLIP A. TALBERT  
17 United States Attorney  
18 PETER K. THOMPSON  
19 Acting Regional Chief Counsel, Region IX  
20 Social Security Administration

21 By: \*/s/ Oscar Gonzalez de Llano  
22 Oscar Gonzalez de Llano  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on January 6, 2022)  
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27  
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**ORDER**

Based upon the foregoing stipulation of the parties (Doc. 23), and for good cause appearing (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including February 14, 2022, in which to file Plaintiff's reply in support of motion for summary judgment.

IT IS SO ORDERED.

Dated: **January 14, 2022**

**/s/ Sheila K. Oberto**  
UNITED STATES MAGISTRATE JUDGE